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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ANGELES CHEMICAL COMPANY,
INC., a California corporation, et al.,

Plaintiff,

vs.

MCKESSON CORPORATION, a
California corporation, et al.,

Defendant.

Northern District Miscellaneous Matter
Case No. C 06-80343 Misc MMC (EDL)
Case No. C 07-80123 Misc MMC (EDL)

Case No. 01-10532 TJH (Ex)
Central District of California

**SQUIRE, SANDERS & DEMPSEY L.L.P.'S
OBJECTIONS TO EVIDENCE
SUBMITTED BY PLAINTIFF ANGELES
CHEMICAL COMPANY, INC. IN
SUPPORT OF ITS MOTION TO COMPEL
SQUIRE, SANDERS & DEMPSEY L.L.P.'S
COMPLIANCE WITH THE MARCH 22,
2007 COURT ORDER**

Date: June 6, 2007
Time: 9:00 A.M.
Courtroom: Courtroom E, 15th Floor

Non-party, Rule 45 Subpoena Recipient Squire, Sanders & Dempsey, L.L.P. (“SSD”) objects to the Declaration of Jeffery L. Caufield in Support of Angeles’ Motion to Compel Squire Sanders & Dempsey’s Compliance with the March 22, 2007 Court Order, including the exhibits thereto as indicated, Case No. C 07-80123 Docket No. 3, as follows:

<u>Paragraph Exhibit/No.</u>	<u>Objection</u>
4, Exhibit C	Exhibit C, purportedly Opposition to SSD's copy of Angeles' Motion to Quash and/or Protective Order Against Angeles' Rule 45 Subpoena dated February 15, 2007, is argument, not evidence, Fed. R. Evid. 701, <i>et seq.</i>
12	Lacks foundation of personal knowledge, Fed. R. Evid. 901; Improper argument and opinion, not evidence, Fed. R. Evid. 701, <i>et seq.</i>
12, Exhibit G	The documents attached as Exhibit G are hearsay, Fed. R. Evid. 803.
14, Exhibit I	The document attached as Exhibit I, including Appendix C attached thereto, is hearsay, Fed. R. Evid. 803.
15, Exhibit J	The documents attached as Exhibit J are hearsay, Fed. R. Evid. 803.
18, Exhibit J	The documents attached as Exhibit J are hearsay, Fed. R. Evid. 803.
17	Hearsay, Fed. R. Evid. 803
18, Exhibit I	The document attached as Exhibit I, including Appendix C attached thereto, is hearsay, Fed. R. Evid. 803.
20	First sentence lacks foundation of personal knowledge, Fed. R. Evid. 901; improper argument and opinion, not evidence, Fed. R. Evid. 701, <i>et seq.</i>
20, Exhibit K	The documents attached as Exhibit K are hearsay, Fed. R. Evid. 803.
38	Lacks foundation of personal knowledge, Fed. R. Evid. 901; improper argument and opinion, not evidence, Fed. R. Evid. 701, <i>et seq.</i>
40	Lacks foundation of personal knowledge, Fed. R. Evid. 901, improper argument and opinion, not evidence, Fed. R. Evid. 701, <i>et seq.</i>

	<u>Paragraph Exhibit/No.</u>	<u>Objection</u>
2	40, Exhibit U	The document attached as Exhibit U is hearsay, Fed. R. Evid. 803; improper argument and opinion, Fed. R. Evid. 701, <i>et seq.</i> , and lacks foundation of personal knowledge, Fed. R. Evid. 901.
4	42, Exhibit V	The document attached as Exhibit V is irrelevant, Fed. R. Evid. 401, and therefore not admissible. Fed. R. Evid. 402.
6	43, Exhibit W	The document attached as Exhibit W is irrelevant, Fed. R. Evid. 401, and therefore not admissible. Fed. R. Evid. 402.

8 Dated: May 22, 2007

Respectfully submitted,

SQUIRE, SANDERS & DEMPSEY L.L.P

11 By: _____ /s/ Diane L. Gibson
Diane L. Gibson

12 Attorneys for Non-Party, Rule 45 Subpoena
13 Recipient Squire, Sanders & Dempsey L.L.P.

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